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March 4, 2022

VIA ECF FILING

Hon. Katherine Polk Failla
United States District Judge
For the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 1105
New York, NY 10007

MEMO ENDORSED

Re: Civil Action No. 1:21-cv-10769-KPF
One World Filter Corporation v. Koslow Technologies Corporation, et al.

Dear Judge Failla:

We represent Defendants Koslow Technologies Corporation (“KT Corp.”) and Evan Koslow (“Mr. Koslow”) (collectively, “Koslow”) in the above-referenced action. Koslow submits this letter motion pursuant to Local Civil Rule 5.2(b) and 7.1(d), as well as Individual Rules of Practice 9(B).

Koslow respectfully requests leave of the Court permitting it to submit a redacted version of its response to Plaintiff’s Motion for Preliminary Injunction dated February 28, 2022 (Doc. Nos. 13-15), with an unredacted version to be filed under seal. Specifically, Koslow seeks to file portions of its memorandum in opposition, Exhibits 1 and 2 in their entirety, and portions of Exhibit 3 under seal (the “Designated Material”). Good cause exists to grant this letter-motion because the Designated Material contains sensitive and proprietary business information not available to the general public and designated as “Highly Confidential” by Koslow. The Designated Material has been narrowly tailored consistent with the presumption in favor of public access to judicial documents.

Therefore, Koslow respectfully requests that the Court grant it leave to file the above-referenced documents under seal.

Respectfully submitted,



Wesley W. Whitmyer, Jr.
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c: All Counsel (via ECF)
New Millennium Concepts, LTD (via first class mail)

Application GRANTED. The Clerk of Court is directed to maintain the documents at docket number 21 under seal, visible to the Court and parties only. The Clerk of Court is further directed to terminate the pending motion at docket number 20.

Dated: March 7, 2022 SO ORDERED.
New York, New York



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE